

Sander L. Esserman, Esq.  
Peter C. D'Apice, Esq.  
STUTZMAN, BROMBERG, ESSERMAN &  
PLIFKA, A Professional Corporation  
2323 Bryan Street, Suite 2200  
Dallas, Texas 75201  
Tel: 214-969-4900  
Fax: 214-969-4999  
[esserman@sbep-law.com](mailto:esserman@sbep-law.com)  
[dapice@sbep-law.com](mailto:dapice@sbep-law.com)

*Counsel to Certain Native  
American Tribes, Health Organizations,  
Municipalities, Unions, and  
Tiffany Dunford as Next Friend  
of T.N. Dunford*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X		
	)	
<b>In re</b>	)	<b>Chapter 11</b>
	)	
<b>PURDUE PHARMA, L.P., et al.,</b>	)	<b>Case No. 19-23649 (RDD)</b>
	)	
<b>Debtors.</b>	)	<b>(Jointly Administered)</b>
	)	
-----X		

**VERIFIED STATEMENT OF STUTZMAN, BROMBERG, ESSERMAN  
& PLIFKA, A PROFESSIONAL CORPORATION, PURSUANT TO  
RULE 2019 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation (“**SBEP**”) hereby  
submits this “**Verified Statement**” pursuant to Rule 2019 of the Federal Rules of Civil  
Procedure, respectfully stating as follows:

1. SBEP is a law firm that maintains its office at 2323 Bryan Street, Suite 2200,  
Dallas, Texas 75201 and has appeared in the above-captioned cases on behalf of the Native  
American Tribes, health organizations, municipalities, and unions (collectively, the  
“**Represented Parties**,” each being a “**Represented Party**”) whose names are listed on

**Exhibit A** hereto and Tiffany Dunford as Next Friend of T.N. Dunford (“Dunford” and also a Represented Party).

2. The names of each creditor at whose instance the employment of SBEP was arranged (*i.e.*, the Represented Parties) are listed on Exhibit A hereto, which is incorporated herein by reference. Fed. R. Bankr. P. 2019(c)(3)(A).

3. The addresses of each of the Represented Parties except for Dunford are as follows:

c/o T. Roe Frazer II  
FRAZER PLC  
30 Burton Hills Boulevard  
Nashville, TN 37215

c/o Frederick T. (“Rick”) Kuykendall, III  
THE KUYKENDALL GROUP  
2013 1st Avenue North, Suite 450  
Birmingham, AL 35203

c/o J. Nixon (“Nix”) Daniel, III  
BEGGS & LANE, RLLP  
501 Commendencia Street  
Pensacola, FL 32502.

Fed. R. Bankr. P. 2019(c)(3)(A).

4. The addresses of Dunford are as follows:

c/o P. Rodney Jackson  
LAW OFFICES OF P. RODNEY JACKSON  
Fifth Third Center  
700 Virginia Street, East  
Charleston, WV 25301

W. Jesse Forbes  
FORBES LAW OFFICES, PLLC  
1118 Kanawha Blvd., East  
Charleston, WV 25301

R. Booth Goodwin II  
Benjamin B. Ware  
W. Jeffrey Vollmer  
GOODWIN & GOODWIN, LLP  
300 Summers Street, Suite 1500  
P.O. Box 2107  
Charleston, WV 25328-2107

W. Stuart Calwell, Jr.  
L. Dante diTrapano  
Alex McLaughlin  
Benjamin D. Adams  
CALWELL LUCE diTRAPANO, PLLC  
Law and Arts Center West  
500 Randolph Street  
Charleston, WV 25302.

Fed. R. Bankr. P. 2019(c)(3)(A).

5. As to the nature and amount of the disclosable economic interests held by each Represented Party in relation to Debtors as of the date of this Verified Statement, each of the Represented Parties has sustained damages as a result of the tortious acts of Debtors in connection with the safety, use, and prescription of opioid products manufactured and/or sold by one or more Debtors. Each Represented Party's claim for such damages is unsecured and unliquidated. Fed. R. Bankr. P. 2019(c)(3)(B).

6. SBEP, through the undersigned counsel, may represent other persons or entities holding claims against the Debtors out of applicable agreements, law or equity pursuant to their relationship with one or more of the Debtors or their predecessors in interest. However, as of the date of this Verified Statement, such persons or entities have not appeared and have not requested that SBEP appear on their behalf in these cases. Other than as outlined herein, as of the filing of this Verified Statement SBEP does not purport to act, represent, or speak on behalf of any parties in connection with these cases other than the Represented Parties.

7. Nothing contained in this Verified Statement (inclusive of Exhibit A hereto) should be construed as a limitation upon, or waiver of any Represented Party's right to assert, file, and/or amend its claim(s) in accordance with applicable law and any orders entered in these cases establishing procedures for filing proofs of claim.

8. SBEP reserves the right to amend or supplement this Verified Statement, as necessary, in accordance with Bankruptcy Rule 2019.

9. The undersigned declares under penalty of perjury that this Verified States is true and accurate to the best of his knowledge, information and belief.

Dated: August 18, 2020  
Dallas, Texas

Respectfully submitted,

STUTZMAN, BROMBERG, ESSERMAN  
& PLIFKA, A PROFESSIONAL  
CORPORATION

By: /s/ Sander L. Esserman

Sander L. Esserman  
Peter C. D'Apice  
2323 Bryan Street, Suite 2200  
Dallas, Texas 75201  
Telephone: (214) 969-4900  
Facsimile: (214) 969-4999

**COUNSEL FOR CERTAIN NATIVE  
AMERICAN TRIBES, HEALTH  
ORGANIZATIONS, MUNICIPALITIES,  
UNIONS, AND TIFFANY DUNFORD AS  
NEXT FRIEND OF T.N. DUNFORD**

**EXHIBIT A**

**The Certain Native American Tribes**

1. Bad River Band of Lake Superior Tribe of Chippewa Indians/Bad River Health & Wellness Center
2. Battle Mountain Band of Te-Moak Tribe of Western Shoshone Indians
3. Big Sandy Rancheria of Mono Indians
4. Big Valley Band of Pomo Indians
5. Cahto Tribe of the Laytonville Rancheria
6. Cher-Ae Heights Indian Community of the Trinidad Rancheria
7. Cheyenne & Arapaho Tribes and Clinic
8. Chicken Ranch Rancheria of Me-Wuk Indians
9. Chitimacha Tribe of Louisiana
10. Coyote Valley Band of Pomo Indians
11. Ely Shoshone Tribe of Nevada
12. Ewiiapaayp Band of Kumeyaay Indians
13. Fallon Paiute-Shoshone Tribe
14. Fond du Lac Band of Superior Chippewa
15. Guidiville Rancheria of California
16. Ho Chunk Nation
17. Hopland Band of Pomo Indians
18. Koi Nation
19. Lac Courte Oreilles Band of Lake Superior
20. Lac du Flambeau Band of Lake Superior Ind.
21. Manchester Band of Pomo Indians
22. Mentasta Traditional Council
23. Narragansett Tribe
24. Pinoleville Pomo Nation
25. Poarch Creek Tribe
26. Potter Valley Tribe
27. Pueblo of Pojoaque
28. Pyramid Lake Paiute Tribe
29. Red Cliff Band of Lake Superior Chippewas
30. Redwood Valley Tribe
31. Reno-Sparks Indian Colony
32. Resighini Rancheria
33. Robinson Rancheria of Pomo Indians
34. Round Valley Indian Tribes and Round Valley Indian Health Clinic
35. Scotts Valley Band of Pomo Indians
36. Shinnecock Indian Nation
37. South Fork Band of the Te-Moak Tribe of Western Shoshone Indians
38. St. Croix Chippewa Indians of WI
39. Walker River Paiute Tribe
40. Wampanoag Tribe of Gay Head (Aquinnah)

## **Other Represented Parties**

### **Hospitals/Healthcare**

1. Apollo MD Business Srvs, LLC
2. Baptist Hospital, Inc. (Baptist Hospital and Jay Hospital)
3. Center Point, Inc.
4. Community Based Care of Brevard, Inc. dba Brevard Family Partnership
5. Community Partnership for Children, Inc.
6. Consolidated Tribal Health Project, Inc.
7. El Campo Memorial Hospital and West Wharton County Hospital District
8. Gonzales Healthcare Systems
9. Greenwood Leflore Hospital
10. Howard Center, Inc.
11. J. Paul Jones Hospital
12. Kids First of Florida, Inc.
13. Lakeview Center, Inc.
14. North Mississippi Medical Center, Inc.
15. Ochiltree County Hospital District
16. Odyssey House; Addiction Recovery Resources, Inc.
17. Pearl River County Hospital & Nursing Home
18. Rush Health Systems, Inc.
19. Seattle Indian Health Board
20. Sharkey-Issaquena Hospital
21. South Central Regional Medical Center
22. Westcare Foundation, Inc.

### **Municipalities**

1. Harrison County, Mississippi
2. Issaquena County, Mississippi
3. Town of Butler, Alabama

### **Unions**

1. United Food & Commercial Workers Union Local 1995 & Employers Health and Welfare Fund
2. United Food & Commercial Workers Local 1000 Oklahoma Health & Welfare Fund
3. South Central United Food & Commercial Workers Union & Employers Health & Welfare Trust Fund
4. United Food & Commercial Workers Union Local 1529 & Employers Health & Welfare Plan and Trust
5. United Food & Commercial Workers Unions and Employers Health and Welfare Fund – Atlanta

**Dunford**

Tiffany Dunford, as Next Friend if T.N. Dunford